



US EPA RECORDS CENTER REGION 5



436632

**Alpha**  
109 Corporate Boulevard  
South Plainfield, NJ 07080 USA

**Jack W Wagner, CHMM**  
Manager, EH&S and Regulatory Affairs  
(America's)  
P: 908-791-3054  
F: 908-791-3090  
jwagner@cookson.com  
alphacpmd.com

May 2, 2012

Michelle Kerr, Remedial Project Manager  
U.S. Environmental Protection Agency  
Superfund Division  
77 West Jackson Blvd., SR-6J  
Chicago, IL 60604

Re: Fry's Metals, Inc. Response to Information Request Pursuant to CERCLA Section 104(e)(2) for the Chemetco Superfund Site in Hartford, Illinois

Dear Ms. Kerr:

Set forth below is Fry's Metals, Inc.'s ("Fry's") response to U.S. EPA's information request pursuant to CERCLA Section 104(e)(2) for the Chemetco Superfund site in Hartford, Illinois ("Response"). Each of the responses were prepared based on information contained in the only record in the possession or control of Fry's or its employees, agents, contractors or attorneys and the knowledge of Jack Wagner, Manager, EH&S and Regulatory Affairs and other individuals identified in the Response. Fry's Metals, Inc. is continuing its evaluation of these matters and will supplement this response if additional information responsive to the information request becomes known or available.

Question 1, (a) thru (f). - Company information.

(a) Company name: Fry's Metals, Inc.

(b) President and Chairman: Richard Ertmann, 109 Corporate Boulevard, South Plainfield, New Jersey 07080.

(c) State of incorporation and agent: Delaware; The Corporation Trust Company.

(d) Subsidiaries, affiliates, etc.: Fry's Metal's, Inc. has no subsidiaries or affiliates. It is a subsidiary of Cookson Investments, Inc.

(e) See response to 1.(c).

(f) Status of subsidiaries, affiliates, etc. Cookson Investments, Inc. is an active corporation.

Question 2. Business documents. A search of Fry's records indicates it has no written business documents related to its doing business with Chemetco. - A search of the Company's computer data bases did identify one electronic document that indicates Fry's conducted financial transactions with Chemetco between the dates 02/24/2000 and 10/17/2001. A total of 106 transactions are recorded. Fry's has no other documents related to these transactions as they are greater than the company's seven (7) year records retention policy. A printout of the electronic records is enclosed as Attachment A to this Response. Fry's has no other knowledge or information responsive to this Request.

Question 3. Documents on Company role at the site. - A search of Fry's records indicates it has no documents related to any role it had at the site. To Fry's knowledge, it had no duties/involvement at the site other than the sale of materials to Chemetco reflected in Attachment A.

Question 4. Nature or size of activities/change over time. - A search of Fry's records indicates it has no documents relating to changes in the nature or size of activities other than the information described in Attachment A. Fry's has no other knowledge or information regarding same.

Question 5. Contracts, agreements or other arrangements for disposal, treatment, trading, or recycling, and control over process/recycling location - A search of Fry's records indicates that, other than record enclosed as Attachment A, it has no documents related to any of Fry's contracts, agreements or other arrangements with Chemetco for the processing/recycling etc. of the materials Fry's sold to Chemetco, or control over the location where materials sent to Chemetco's warehouses (if any) were sent to be processed or recycled. Fry's has no other knowledge or information concerning same.

Question 6. Dates and circumstances when Respondent's waste or material was taken to the site and entities that brought same to site. - A search of Fry's records indicates that, other than the document enclosed as Attachment A, it has no documents related to dates and circumstances when its materials were taken to the site, nor to the entity or entities that took those materials to the site, Fry's has no other information responsive to this Request.

Question 7. Transaction with Chemetco outright sale, tolling or other transaction. - A search of Fry's records indicates that, other than the document enclosed as attachment A, it has no documents responsive to this request. To the best of Fry's knowledge, its materials were sold to Chemetco for metals recovery/recycling purposes.

Question 8. Influence over waste disposal or recycling activities at the Site. - A search of Fry's records indicates that, other than the document enclosed as Attachment A, Fry's has no documents responsive to this request. To the best of Fry's knowledge, it had no influence over any activities at the Chemetco site.

Question 9. Materials sent to the Chemetco site ever refused and/or returned. - A search of our records indicates that it has no documents related to refused and/or returned material. Fry's has no other knowledge or information responsive to this request.

Question 10. Types of materials sent to the Chemetco site for recycling, processing, or disposal. - A search of our records indicates that, other than the document enclosed as Attachment A, Fry's has no documents related to the types of materials it sent to the Chemetco site. As indicated in that document, a total of 106 transactions were recorded. Column G of the spreadsheet is "Item Description". This Column identifies four types of materials sent to the site as follows: Dross Slag; Dross Baghouse Dust (Smelting); Reclaim Cut Leads - Bulk 00; and Secondary Metals DeCop Metal. Based on Fry's general knowledge of its operations at the time relevant to this response and its current operations, Fry's is providing its best attempt at describing the materials as follows:

Dross Slag - This is a byproduct of our Solder Dross recycling operation. It contains sodium oxide; calcium oxide; and silica dioxide, as well as metals typical of the solder industry including, but not limited to, tin, lead, silver, copper and antimony.

Dross Baghouse Dust - This is a byproduct of our Solder Dross recycling operation. It is the particles (dust) collected from our air pollution control equipment. It contains metal oxides typical of the solder industry including but not limited to tin, lead, silver, copper and antimony.

Reclaim Cut Leads - Bulk 00 - When electronic components are attached to a circuit board, the excess copper wire is cut off. This cut off wire is called cut leads. This material is an accumulation of these cut off pieces of copper wire. This material meets the definition of "scrap metal".

Secondary Metals DeCop Metal - Copper matte is a copper sulfide material. It is generated when DeCop dross (dross formed when molten solder is treated with sulfur to remove copper) is smelted. Although the material is mostly copper sulfide, it does contain some of the solder that had been trapped in the material while processing.

Question 10 (a) Materials delivered directly to site or trans-shipped. - A search of its records indicates that, other than the document enclosed as Attachment A, Fry's has no documents relating to direct versus trans-shipment of materials to the Chemetco site. The enclosed documents appear to indicate that Fry's materials were delivered to two (2) addresses: 3576 Chemetco Lane, Hartford, Illinois and Route 3 & Oldenburg, Hartford, Illinois.

(b) Material analysis. - Materials are typically tested by our in-house metals lab. Analysis is for total metal content in the materials. Since our Chemetco transactions occurred over 10 years ago, Fry's has no records other than the document enclosed as Attachment A.

( c ) Chemetco processing of materials. - Fry's has no records reflecting the types of processing completed by Chemetco on its materials. To the best of Fry's knowledge, based on an audit Fry's conducted of the Chemetco site more than 10 years ago, Chemetco conducted appropriate metal recovery/recycling of Fry's materials, and involved the storage and handling of Fry's materials inside an enclosed building.

(d) Additional documents and information on types of materials sent to the Chemetco site. Except as set forth in this response to Request #10 and Attachment A, Fry's has no other documents or information responsive to this Request.

(e) Years Fry's sent materials to the Chemetco site. The records enclosed as Attachment A indicate Fry's sent materials between 02/24/2000 and 10/17/2001. Fry's has no other documents or information responsive to this request.

Questions and Requests for Documents Related to Scrap Metal

Question 11. Transactions involving scrap metal.

(a) thru (h) – Fry's has no records other than the document enclosed as Attachment A and the responses to previous answers listed above. To the best of Fry's knowledge:

(a) At the time Fry's sold its materials to Chemetco, markets existed for the metals contained in those materials (primarily tin, lead, silver, copper and antimony), and Fry's understood that Chemetco recovered and sold the metals to those markets.

(b) Fry's is unaware that any of its materials met a commercial specification grade.

(c) Fry's sold its materials to Chemetco for the recovery/recycling of the metals those materials contained.

(d) Fry's believed that all of the materials it sent to Chemetco were used as feedstocks to Chemetco's metals recovery operations to produce saleable metal products and that all of the metals recovered were used to make other new products.

(e) Fry's is unaware that its materials have been used as a replacement or substitute for a virgin raw material.

(f) Unknown.

(g) Fry's does not believe the materials it sent to the site were melted before transport/delivery to the site.

(h) All of Fry's materials sold to Chemetco were byproducts of Fry's solder recycling operations.

Question 12. Other materials incident to or adhering to Fry's scrap metal. – Fry's has no knowledge other than the information provided above.

Question 13. Wire or wiring. – Fry's reclaim cut leads are uninsulated copper wire that may contain small amounts of solder.

Question 14. Shipping containers. – Dross slag was shipped in bulk; dross baghouse dust was shipped in "super sacks;" reclaim cut leads were shipped in drums or gaylords; and copper matte was shipped in drums. Drums used for shipping were either purchased new by Fry's or received from Fry's suppliers of scrap solder. To the best of Fry's knowledge, none of those drums ever contained liquids.

Question 15. Site visits. – See response to questions 10(c) above and 17, below.

Questions and Requests for Documents Related to Electrical and Electronic Equipment

Michelle Kerr, Remedial Project Manager

May 2, 2012

Page 5

Questions 16 (a) and (b). – Based on its search of its records, its review of the document enclosed in Attachment A, and its general understanding of the byproducts of its operations, Fry's does not believe it engaged in transactions with Chemetco involving electrical or electronic equipment.

Question 17 Processing assurances. - A search of its records indicates that Fry's has no documents responsive to this request. To the best of Fry's knowledge and belief, and as indicated in Fry's response to question 10(c), it conducted an audit of Chemetco's operations at some time prior to or during the period of time it engaged in transactions with Chemetco and that, based on that audit, Fry's believed that Chemetco was appropriately reclaiming/recycling Fry's materials.

Question 18. Efforts taken to investigate Chemetco's operations and environmental compliance. - A search of our records indicates that Fry's has no documents responsive to this request. See responses to Questions 10(c) and 17.

Question 19 Compliance with CERCLA recycling requirements. – Except as otherwise provided in its responses above, Fry's has no information responsive to this Request.

Question 20. Compliance with RCRA recycling requirements. – Based on Fry's records of RCRA inspections conducted by PADEP and/or U.S.EPA, Fry's is unaware of any violations of the RCRA recycling requirements. Except as otherwise provided in this response and its responses above, Fry's has no other information responsive to this Request.

Question 21. Respondent's EPA ID Number. - The Respondent's RCRA EPA ID# is PAD089352983.

Question 22 Respondent reporting under federal and state environmental laws. Fry's submits reports under the Clean Water Act, EPCRA, Clean Air Act, RCRA, TSCA, and their State of Pennsylvania equivalents.

Question 23 Address of federal and state offices where reports were sent.

Altoona City Water Authority  
144 Westerly Treatment Plant Road  
Duncansville, PA 16635

PA Department of Labor & Industry  
PENNSAFE  
155E L&I Building  
651 Boas Street  
Harrisburg, PA 17121  
U.S. EPA

Via TRI-MEweb  
Via <http://www.epa.gov/epawaste/inforesources/data/biennialreport/index.htm>

PADEP Air Quality Program  
PADEP

Michelle Kerr, Remedial Project Manager

May2, 2012

Page 6

909 Elmerton Ave.  
Harrisburg, PA 17110-8200

PADEP  
South Central Region – Field Operations  
Bureau of Water Quality Management  
909 Elmerton Ave.  
Harrisburg, PA 17110-8200

PADEP  
Bureau of Waste Management  
PO Box 8550  
Harrisburg, PA 17110-8200

U.S. EPA  
Office of Pollution Prevention & Toxics  
401 M Street, SW  
Washington DC 20460

Question 24 Other Persons that may have additional information or documents – Fry's Purchasing / Recycling Manager during the relevant time period may have additional information. His name is Mr. David Colmer but he no longer works for Fry's and has not worked for Fry's for approximately ten (10) years.

Question 25 (a) thru (d). Document availability / retention of records between 1970 and 2001 - A search of our records indicates we have no documents related to Fry's record retention policies prior to 2006. To the best of Fry's knowledge, that record retention policy was based on generally accepted accounting principals (GAAP) which, Fry's believes, would have required retention of most documents for seven (7) years. A document retention policy issued in 2006 established document retention periods for the types of documents responsive to U.S.EPA's Request of five (5) to seven (7) years. (RCRA hazardous waste manifest are kept for three years and environmental permit records retention requirements are stipulated in the permit, but is typically five years but can vary.) Obsolete records are shredded. The identities of the persons responsible for producing, retaining and destroying such documents during the relevant period has not been determined. To the best of Fry's knowledge, no persons would have copies or originals of documents no longer in Fry's records.

Question 25(e) Responsible Person.

Jack W Wagner  
EHS Manager  
4100 6<sup>th</sup> Avenue  
Altoona Pa 16602

Michelle Kerr, Remedial Project Manager

May2, 2012

Page 7

Question 26 Names of Individuals Consulted in Preparation of this Response

Jack W Wagner  
EHS Manager  
4100 6<sup>th</sup> Avenue, Altoona Pa 16602

Jim Kachmar  
Reclaim Manager  
4100 6<sup>th</sup> Avenue, Altoona Pa 16602

Tracy Mock  
Reclaim Supervisor  
4100 6<sup>th</sup> Avenue  
Altoona Pa 16602

Barry Little  
Controller  
4100 6<sup>th</sup> Avenue  
Altoona Pa 16602

H. Daniel Weaver  
Director of Manufacturing and Support  
4100 6<sup>th</sup> Avenue  
Altoona Pa 16602

I certify under penalty of law that this document and all enclosures were prepared or attached under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my knowledge and inquiry of the persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete as of the date of this response. I am aware that there are significant penalties for submitting false information, including fine and imprisonment for knowing violations.

Very truly yours,



Fry Metals, Inc., dba Alpha

Name: Jack W. Wagner, CHMM

Title: Manager, EH&S and Regulatory Affairs (America's)

Date: May 2, 2012

Michelle Kerr, Remedial Project Manager  
May2, 2012  
Page 8

cc: Mark Jacobs, Esq.



## BLITTLE/SALESRPT - Design

01NS

Name Search

Resp B/Unit

Alpha Name . . chemetco

Search Type

Ship tos?

Alpha Name

Address

Chemetco 3576 Chemetco Lane - Hartford, Ill.

Chemetco Route 3 &amp; Oldenburg - Hartford Ill.

Chemet Corporation 52 Gardner Street - Attleboro, MA

Chemet Corporation P O Box 1928 - Attleboro, MA

Chemet Corporation 52 Gardner Street - Attleboro, MA

Chemet Corporation-Wire Transfer- Fla 52 Gardner Street - Attleboro, MA

Sector	Invoice Date	Shipped from Location	Mo.	Yr.	item	Item Description	Sold to #	Ship to #	PT	PG	Alloy	DT	Invoice #	BU
IND	04/06/00	PRIM	4	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	227433	FIP
IND	04/11/00	PRIM	4	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	232473	FIP
IND	04/11/00	PRIM	4	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	232474	FIP
IND	05/16/00	PRIM	5	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	240390	FIP
IND	05/16/00	PRIM	5	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	240391	FIP
IND	05/16/00	PRIM	5	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	240392	FIP
IND	05/17/00	PRIM	5	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	240715	FIP
IND	05/18/00	PRIM	5	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	241002	FIP
IND	05/18/00	PRIM	5	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	241003	FIP
IND	06/01/00	PRIM	6	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	245864	FIP
IND	06/02/00	PRIM	6	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	246249	FIP
IND	07/19/00	PRIM	7	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	258319	FIP
IND	09/18/00	PRIM	9	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	275523	FIP
IND	09/21/00	PRIM	9	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	276628	FIP
IND	09/22/00	PRIM	9	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	277006	FIP
IND	09/25/00	PRIM	9	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	277495	FIP
IND	09/27/00	PRIM	9	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	278334	FIP
IND	09/27/00	PRIM	9	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	278336	FIP
IND	09/28/00	PRIM	9	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	278749	FIP
IND	10/03/00	PRIM	10	0	102027	Dross Slag	148303	148303	DRS	***	225	SX	280290	FIP
IND	01/22/01	PRIM	1	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	309330	FIP
IND	01/22/01	PRIM	1	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	309331	FIP

## BLITTLE/SALESRPT - Design

IND	01/23/01	PRIM	1	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	309850	FIP
IND	01/23/01	PRIM	1	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	309851	FIP
IND	01/24/01	PRIM	1	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	310231	FIP
IND	04/18/01	PRIM	4	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	336572	FIP
IND	03/12/01	PRIM	3	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	322813	FIP
IND	03/14/01	PRIM	3	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	323524	FIP
IND	03/14/01	PRIM	3	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	323525	FIP
IND	03/16/01	PRIM	3	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	324216	FIP
IND	04/10/01	PRIM	4	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	334747	FIP
IND	04/10/01	PRIM	4	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	334748	FIP
IND	04/16/01	PRIM	4	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	335877	FIP
IND	04/16/01	PRIM	4	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	335878	FIP
IND	05/15/01	PRIM	5	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	348118	FIP
IND	05/16/01	PRIM	5	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	348404	FIP
IND	07/17/01	PRIM	7	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	366547	FIP
IND	07/19/01	PRIM	7	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	367206	FIP
IND	07/20/01	PRIM	7	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	367541	FIP
IND	07/23/01	PRIM	7	1	102027	Dross Slag	138150	138150	DRS	***	225	SX	367807	FIP
IND	10/15/01	PRIM	10	1	102027	Dross Slag	148303	148303	DRS	***	225	SX	392170	FIP
IND	10/17/01	PRIM	10	1	102027	Dross Slag	148303	148303	DRS	***	225	SX	392868	FIP
IND	09/05/01	PRIM	9	1	102027	Dross Slag	148303	148303	DRS	***	225	SX	382965	FIP
IND	09/06/01	PRIM	9	1	102027	Dross Slag	148303	148303	DRS	***	225	SX	383273	FIP
IND	02/26/00	PRIM	3	0	102028	Dross Baghouse Dust (Smelting)	138150	138150	DRS	***	225	SX	215338	FIP
IND	02/26/00	PRIM	3	0	102028	Dross Baghouse Dust (Smelting)	138150	138150	DRS	***	225	SX	215338	FIP
IND	06/09/00	PRIM	6	0	102028	Dross Baghouse Dust (Smelting)	148303	148303	DRS	***	225	SX	248020	FIP
IND	07/26/00	PRIM	7	0	102028	Dross Baghouse Dust (Smelting)	148303	148303	DRS	***	225	SX	260397	FIP
IND	09/21/00	PRIM	9	0	102028	Dross Baghouse Dust (Smelting)	148303	148303	DRS	***	225	SX	276629	FIP
IND	11/13/00	PRIM	11	0	102028	Dross Baghouse Dust (Smelting)	148303	148303	DRS	***	225	SX	291951	FIP
IND	12/13/00	PRIM	12	0	102028	Dross Baghouse Dust (Smelting)	148303	148303	DRS	***	225	SX	300041	FIP
IND	01/03/01	PRIM	1	1	102028	Dross Baghouse Dust (Smelting)	148303	148303	DRS	***	225	SX	304564	FIP
IND	03/12/01	PRIM	3	1	102028	Dross Baghouse Dust (Smelting)	138150	138150	DRS	***	225	SX	322814	FIP
IND	05/01/01	PRIM	5	1	102028	Dross Baghouse Dust (Smelting)	138150	138150	DRS	***	225	SX	344596	FIP
IND	06/11/01	PRIM	6	1	102028	Dross Baghouse Dust (Smelting)	138150	138150	DRS	***	225	SX	354145	FIP
IND	08/06/01	PRIM	8	1	102028	Dross Baghouse Dust (Smelting)	138150	138150	DRS	***	225	SX	370972	FIP
IND	10/01/01	PRIM	10	1	102028	Dross Baghouse Dust (Smelting)	148303	148303	DRS	***	225	SX	389041	FIP
IND	10/02/01	PRIM	10	1	102028	Dross Baghouse Dust (Smelting)	148303	148303	DRS	***	225	SX	389319	FIP
IND	03/20/01	PRIM	3	1	137152	Reclaim Cut Leads - Bulk 00	138150	138150	RCM	***	225	SX	324913	FIP

## BLITTLE/SALESRPT - Design

[illegible]

BLITTLE/SALESRPT - Design

IND	02/19/01	PURCH	2	1	101201	Secondary Metals De-Cu Metal	138150	138150	SCM	055	SX	317205	FCX
IND	02/24/00	PRIM	2	0	132277	Secondary Metals DeCop Metal	138150	138150	SCM		SX	214664	FIP
IND	02/24/00	PRIM	2	0	132277	Secondary Metals DeCop Metal	138150	138150	SCM		SX	214664	FIP
IND	02/24/00	PRIM	2	0	132277	Secondary Metals DeCop Metal	138150	138150	SCM		SX	214664	FIP
IND	02/24/00	PRIM	2	0	132277	Secondary Metals DeCop Metal	138150	138150	SCM		SX	214664	FIP
IND	08/08/00	PURCH	8	0	132277	Secondary Metals DeCop Metal	148303	148303	SCM		SX	264061	FCX
IND	08/08/00	PURCH	8	0	132277	Secondary Metals DeCop Metal	148303	148303	SCM		SX	264061	FCX
IND	08/08/00	PURCH	8	0	132277	Secondary Metals DeCop Metal	148303	148303	SCM		SX	264061	FCX
IND	08/08/00	PURCH	8	0	132277	Secondary Metals DeCop Metal	148303	148303	SCM		SX	264061	FCX
IND	08/31/00	PURCH	9	0	132277	Secondary Metals DeCop Metal	148303	148303	SCM		SX	271016	FCX

## BLITTLE/SALESRPT - Design

Customer	Qty	uom	Unit Price	Extended Price	Currency	Sales Region	Order Date
CHEMETCO	175,600	LB	.000	0	USD	HIN	04/06/00
CHEMETCO	38,324	LB	.000	0	USD	HIN	04/07/00
CHEMETCO	40,900	LB	.000	0	USD	HIN	04/07/00
CHEMETCO	44,980	LB	.000	0	USD	HIN	05/12/00
CHEMETCO	47,800	LB	.000	0	USD	HIN	05/12/00
CHEMETCO	49,080	LB	.000	0	USD	HIN	05/12/00
CHEMETCO	47,140	LB	.000	0	USD	HIN	05/12/00
CHEMETCO	44,000	LB	.000	0	USD	HIN	05/12/00
CHEMETCO	42,840	LB	.000	0	USD	HIN	05/12/00
CHEMETCO	42,400	LB	.000	0	USD	HIN	05/12/00
CHEMETCO	46,740	LB	.000	0	USD	HIN	05/16/00
CHEMETCO	40,060	LB	.000	0	USD	HIN	07/19/00
CHEMETCO	45,860	LB	.000	0	USD	HIN	09/18/00
CHEMETCO	37,960	LB	.000	0	USD	HIN	09/18/00
CHEMETCO	43,860	LB	.000	0	USD	HIN	09/18/00
CHEMETCO	44,000	LB	.000	0	USD	HIN	09/18/00
CHEMETCO	44,120	LB	.000	0	USD	HIN	09/18/00
CHEMETCO	38,060	LB	.000	0	USD	HIN	09/27/00
CHEMETCO	41,220	LB	.000	0	USD	HIN	09/28/00
CHEMETCO	37,500	LB	.000	0	USD	HIN	09/28/00
Chemetco	42,880	LB	.000	0	USD	HIN	01/11/01
Chemetco	44,620	LB	.000	0	USD	HIN	01/11/01

## BLITTLE/SALESRPT - Design

Chemetco	40,760	LB	.000	0	USD	HIN	01/11/01
Chemetco	45,080	LB	.000	0	USD	HIN	01/11/01
Chemetco	44,000	LB	.000	0	USD	HIN	01/11/01
Chemetco	45,220	LB	.000	0	USD	HIN	04/18/01
Chemetco	44,600	LB	.000	0	USD	HIN	03/02/01
Chemetco	41,660	LB	.000	0	USD	HIN	03/02/01
Chemetco	48,940	LB	.000	0	USD	HIN	03/02/01
Chemetco	46,080	LB	.000	0	USD	HIN	03/02/01
Chemetco	41,980	LB	.000	0	USD	HIN	04/06/01
Chemetco	43,780	LB	.000	0	USD	HIN	04/06/01
Chemetco	39,300	LB	.000	0	USD	HIN	04/06/01
Chemetco	45,860	LB	.000	0	USD	HIN	04/06/01
Chemetco	45,880	LB	.000	0	USD	HIN	05/11/01
Chemetco	41,440	LB	.000	0	USD	HIN	05/11/01
Chemetco	44,660	LB	.000	0	USD	HIN	07/16/01
Chemetco	46,640	LB	.000	0	USD	HIN	07/16/01
Chemetco	46,180	LB	.000	0	USD	HIN	06/19/01
Chemetco	43,060	LB	.000	0	USD	HIN	07/23/01
CHEMETCO	46,580	LB	.000	0	USD	HIN	08/23/01
CHEMETCO	37,080	LB	.000	0	USD	HIN	08/23/01
CHEMETCO	42,740	LB	.000	0	USD	HIN	08/23/01
CHEMETCO	40,880	LB	.000	0	USD	HIN	08/23/01
Chemetco	33,948	LB	.000	0	USD	HIN	02/24/00
Chemetco	35,056	LB	.000	0	USD	HIN	02/24/00
CHEMETCO	39,858	LB	.000	0	USD	HIN	06/07/00
CHEMETCO	39,815	LB	.000	0	USD	HIN	07/25/00
CHEMETCO	40,891	LB	.000	0	USD	HIN	09/20/00
CHEMETCO	41,959	LB	.000	0	USD	HIN	11/09/00
CHEMETCO	41,365	LB	.000	0	USD	HIN	12/06/00
CHEMETCO	39,144	LB	.000	0	USD	HIN	01/03/01
Chemetco	41,637	LB	.000	0	USD	HIN	03/07/01
Chemetco	40,360	LB	.000	0	USD	HIN	04/30/01
Chemetco	40,589	LB	.000	0	USD	HIN	06/05/01
Chemetco	35,356	LB	.000	0	USD	HIN	08/02/01
CHEMETCO	41,172	LB	.000	0	USD	HIN	09/27/01
CHEMETCO	23,226	LB	.000	0	USD	HIN	10/01/01
Chemetco	603	LB	.000	0	USD	HIN	03/19/01

## BLITTLE/SALESRPT - Design

Chemetco	160 LB	.000	0	USD	HIN	03/19/01
Chemetco	644 LB	.000	0	USD	HIN	03/19/01
Chemetco	2,027 LB	.000	0	USD	HIN	03/19/01
Chemetco	47 LB	.000	0	USD	HIN	03/19/01
Chemetco	253 LB	.000	0	USD	HIN	03/19/01
Chemetco	755 LB	.000	0	USD	HIN	03/19/01
Chemetco	134 LB	.000	0	USD	HIN	03/19/01
Chemetco	746 LB	.000	0	USD	HIN	03/19/01
Chemetco	765 LB	.000	0	USD	HIN	03/19/01
Chemetco	189 LB	.000	0	USD	HIN	03/19/01
Chemetco	1,983 LB	.000	0	USD	HIN	03/19/01
Chemetco	695 LB	.000	0	USD	HIN	03/19/01
Chemetco	828 LB	.000	0	USD	HIN	03/19/01
Chemetco	116 LB	.000	0	USD	HIN	03/19/01
Chemetco	98 LB	.000	0	USD	HIN	03/19/01
Chemetco	276 LB	.000	0	USD	HIN	03/19/01
Chemetco	893 LB	.000	0	USD	HIN	03/19/01
Chemetco	39 LB	.000	0	USD	HIN	03/19/01
Chemetco	1,574 LB	.000	0	USD	HIN	03/19/01
Chemetco	702 LB	.000	0	USD	HIN	03/19/01
Chemetco	75 LB	.000	0	USD	HIN	03/19/01
Chemetco	927 LB	.000	0	USD	HIN	03/19/01
Chemetco	61 LB	.000	0	USD	HIN	03/19/01
Chemetco	57 LB	.000	0	USD	HIN	03/19/01
Chemetco	61 LB	.000	0	USD	HIN	03/19/01
Chemetco	205 LB	.000	0	USD	HIN	03/19/01
CHEMETCO	22,046 LB	.000	0	USD	HIN	08/24/01
CHEMETCO	111 LB	.000	0	USD	HIN	08/24/01
CHEMETCO	59 LB	.000	0	USD	HIN	08/24/01
CHEMETCO	260 LB	.000	0	USD	HIN	08/24/01
CHEMETCO	69 LB	.000	0	USD	HIN	08/24/01
CHEMETCO	591 LB	.000	0	USD	HIN	08/24/01
CHEMETCO	149 LB	.000	0	USD	HIN	08/24/01
CHEMETCO	949 LB	.000	0	USD	HIN	08/24/01
CHEMETCO	178 LB	.000	0	USD	HIN	08/24/01
CHEMETCO	1,332 LB	.000	0	USD	HIN	08/24/01
Chemetco	43,383 LB	.868	37,656	USD	HIN	02/14/01

## BLITTLE/SALESRPT - Design

Chemetco	39,662	LB	.851	33,780	USD	HIN	02/19/01
Chemetco	12,530	LB	.000	0	USD	HIN	02/24/00
Chemetco	10,620	LB	.000	0	USD	HIN	02/24/00
Chemetco	9,222	LB	.000	0	USD	HIN	02/24/00
Chemetco	10,402	LB	.000	0	USD	HIN	02/24/00
CHEMETCO	12,530	LB	.961	12,048	USD	HIN	08/08/00
CHEMETCO	10,620	LB	.961	10,211	USD	HIN	08/08/00
CHEMETCO	9,222	LB	.961	8,867	USD	HIN	08/08/00
CHEMETCO	10,402	LB	.961	10,002	USD	HIN	08/08/00
CHEMETCO	43,767	LB	.709	31,044	USD	HIN	08/31/00